

**UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH,  
Individually and as Parent and Legal  
Guardian of W.W., K.W., G.W., and  
L.W., minor children, and MATTHEW  
WADSWORTH,

Plaintiffs,

v.

WALMART, INC. and JETSON  
ELECTRIC BIKES, LLC,

Defendants.

Case No.: 2:23-cv-00118-NDF

JURY TRIAL DEMANDED

---

**NOTICE OF FILING**  
**CORRESPONDENCE IN SUPPORT OF PLAINTIFFS' MOTION FOR**  
**PROTECTIVE ORDER AS TO THE DEPOSITIONS OF PLAINTIFFS'**  
**MINOR CHILDREN**

Plaintiffs, STEPHANIE WADSWORTH, Individually and as Parent and Legal Guardian of W.W., K.W., G.W., and L.W., minor children and MATTHEW WADSWORTH, by and through the undersigned Counsel hereby file this Notice of Filing as follows:

Exhibit A: Correspondence from Mindy R. Tellefson, LCSW to support Plaintiffs' Motion for Protective Order.

Date: March 20, 2024

Respectfully Submitted,

/s/ Taly Goody

---

**TALY GOODY, ESQ.**

Wyoming Bar No.: 8-6737

**GOODY LAW GROUP**

58 Malaga Cove Plaza

Palos Verdes Estates, CA 90274

Telephone: (310) 893-1983

Email: taly@GoodyLawGroup.com

*Attorney for Plaintiff*

/s/ T. Michael Morgan

---

**T. MICHAEL MORGAN, ESQ.\***

Florida Bar No.: 062229

Kentucky Bar No.: 94856

**MORGAN & MORGAN, P.A**

20 N. Orange Ave., Suite 1600

Orlando, FL 32801

Telephone: (407) 420-1414

Primary Email: mmorgan@forthepeople.com

Secondary Email:

akelseyflowers@forthepeople.com

*\*Pro Hac Vice Attorney for Plaintiff*

/s/ Rudwin Ayala

---

**RUDWIN AYALA, Esq.\***

Florida Bar No.: 84005

**MORGAN & MORGAN, P.A**

1700 Palm Beach Lakes Blvd, Suite 500

West Palm Beach, FL 33401

Telephone: (561) 764-2220

Facsimile: (561) 764-2270

Primary Email: rayala@forthepeople.com

Secondary Email: sleroy@forthepeople.com

*\*Pro Hac Vice Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 20, 2024, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

Counsels for Defendants:

Eugene M. LaFlamme – [elaflamme@MLLlaw.com](mailto:elaflamme@MLLlaw.com)

Holly L. Tysse – [htysse@crowleyfleck.com](mailto:htysse@crowleyfleck.com)

/s/ Rudwin Ayala  
**RUDWIN AYALA, Esq.**